

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

IVETTE ORTIZ ZAYAS

DEBTOR

CASE NO 14-08238 EAG

CHAPTER 13

**DEBTOR'S REPLY TO TRUSTEE'S REQUEST ENTRY OF ORDER
DOCKET NO. 159
AND DEBTOR'S REQUEST FOR EXTENSION OF TIME
RE: 2015 TAX REFUND**

TO THE HONORABLE COURT:

COMES NOW, IVETTE ORTIZ ZAYAS, the Debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. On December 26, 2018, the Chapter 13 Trustee filed a *Trustee's Request Entry of Order*, Docket No. 159, stating that the Trustee did not receive the Debtor's 2015 tax refund in the sum of \$1,134.00, thus, requesting the Court to Order the Debtor to tender to the Trustee within fourteen days said amount of \$1,134.00. *Trustee's Request Entry of Order*, at paragraphs 2 and 3, Docket No. 159

2. The Debtor hereby respectfully states and admits that due to an involuntary omission, the funds from the Debtor's 2015 tax refund were not tendered to the Chapter 13 Trustee nor a timely request for prior use of these funds was filed with the Court.

3. The Debtor respectfully states that the Debtor used these funds for reasonable and necessary expenses and without any intent to willfully fail to comply with the terms of the Debtor's confirmed Plan.

4. The Debtor respectfully states that she is in the process of obtaining the funds to pay into the Plan the sum of \$1,134.00, which is the amount received in tax refund for the year 2015.

5. The Debtor respectfully requests that the Debtor be granted additional time within to pay to the Chapter 13 Trustee the aforestated amount of \$1,134.00. The Debtor requests thirty (30) days within to make the aforementioned tax refund Plan payment. This extension of time to expire on February 08, 2019.

WHEREFORE, the Debtor respectfully requests from this Honorable Court to grant the present motion in Reply to the *Trustee's Request Entry of Order*, Docket No. 159, and grant the requested extension of time, in the above captioned case.

I HEREBY CERTIFY that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee and to all Cm/ECF system participants; and I also certify that I have mailed by United States Postal Service copy of this motion to the Debtor, Ivette Ortiz Zayas, PO Box 2055 Salinas PR 00751, in the above captioned case.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 09th day of January, 2019.

/s/**Roberto Figueroa Carrasquillo**

USDC #203614

RFIGUEROA CARRASQUILLO LAW OFFICE PSC

ATTORNEY FOR the DEBTOR

PO BOX 186 CAGUAS PR 00726-0816

TEL 787-744-7699 FAX 787-746-5294

EMAIL: rfigueroa@rfclawpr.com